

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

UNITED STATES OF AMERICA	)	CR. NO. <u>8:22 CR 390</u>
	)	18 U.S.C. § 641
vs.	)	18 U.S.C. § 981(a)(1)(C)
	)	28 U.S.C. § 2461(c)
	)	
TAMMY MARIE KELLY	)	<u>INDICTMENT</u>

THE GRAND JURY CHARGES:

That from in or around January 2017, through in or around January 2022, in the District of South Carolina, the Defendant, TAMMY MARIE KELLY, knowingly and willfully did embezzle, steal, purloin and convert to her own use and the use of another funds in excess of \$1,000.00, which belonged to the Social Security Administration, a department or agency of the United States;

In violation of Title 18, United States Code, Section 641.

**FORFEITURE**

**THEFT OF PUBLIC MONEY:**

Upon conviction for a violation of Title 18, United States Code, Section 641 as charged in this Indictment, the Defendant, TAMMY MARIE KELLY, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offense.

**PROPERTY:**

Pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offense charged in this Indictment includes, but is not limited to, the following:

**Cash Proceeds/Forfeiture Judgment:**

A sum of money equal to all proceeds the Defendant obtained directly or indirectly as a result of the offense charged in this Indictment, that is, a minimum of approximately \$65,954.00 in United States currency, and all interest and proceeds traceable thereto.

**SUBSTITUTE ASSETS**

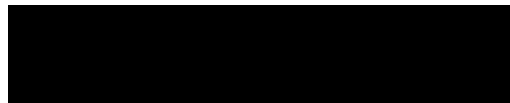
If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), [incorporating Title 21, United States Code, Section 853(p)], to seek forfeiture of any other property of the said Defendant up to the value of the above forfeitable property;

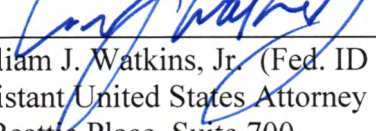
Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON

COREY F. ELLIS  
UNITED STATES ATTORNEY

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